

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff

v.

MARINA LOZOYA,
JORGE CARRIZALES,
HANIEL MATOS, and
FELIX SANTOS-ALMONTE

Defendants.

Criminal Action No. 07- **45-ALL-UNA**

INDICTMENT

The Federal Grand Jury for the District of Delaware charges that:

COUNT I

From on or about September 29, 2006, and continuing to on or about March 8, 2007, in the State and District of Delaware and elsewhere, MARINA LOZOYA, JORGE CARRIZALES, HANIEL MATOS, and FELIX SANTOS-ALMONTE, defendants herein, did knowingly conspire with each other and with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, a violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

All in violation of Title 21, United States Code, Section 846.

COUNT II

On or about February 22, 2007, in the State and District of Delaware and elsewhere, MARINA LOZOYA and JORGE CARRIZALES, defendants herein, did knowingly and intentionally attempt to distribute 500 grams or more of a mixture and substance containing a

detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

All in violation of Title 21, United States Code, Section 846.

COUNT III

On or about February 28, 2007, in the State and District of Delaware, HANIEL MATOS and FELIX SANTOS-ALMONTE, defendants herein, did knowingly and intentionally attempt to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

All in violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

Upon conviction of the controlled substance offense alleged in Counts I-III of this Indictment, defendants MARINA LOZOYA, JORGE CARRIZALES, HANIEL MATOS, and FELIX SANTOS-ALMONTE shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation, including but not limited to approximately \$18,310 in United States currency.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

for
By: 

Robert F. Kravetz
Assistant United States Attorney

Dated: March 27, 2007